

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: *MCI Entities*

Contact: Counsel for MCI: *Deborah Kuhn/Niles Berman*
Telephone Number: (312) 260-3326/(608) 441-3824
e-mail: deborah.kuhn@mci.com/nberman@wheelerlaw.com

Subject Matter Expert (SME): *Jeffrey Quinn/Sherry Lichtenberg*
Telephone Number: (312) 260-3445/(202) 736-6580
e-mail: jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com

Authorized Representative: *Contact Counsel*
Telephone Number:
e-mail:

IV. Issue Identification

Name: **IDENTIFICATION OF BUSINESS RULES ASSOCIATED WITH USOCs/RATES**

Brief Description: Require SBC to identify the Business Rules associated with each USOC and rate billed in Wisconsin

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? MCI began requesting that SBC provide this information approximately six months ago during Michigan 271 proceedings.

2. How many occurrences and approximately over how long a period of time? N/A
3. Is it a recurring problem? N/A
4. Your belief as to the cause of the problem. N/A
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High
7. Any other pertinent information? Requiring SBC to identify the Business Rules associated with each USOC and rate billed in Wisconsin will assist CLECs in auditing SBC's wholesale bills and filing disputes.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? See #1 above
2. Was this issue escalated for dispute resolution? If so, when and in what forum? N/A
3. Last known position of the opposing carrier. SBC has not provided the requested information, despite repeated requests.
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Require SBC to identify the Business Rules associated with each USOC and rate appearing on CLEC bills in Wisconsin

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

SBC is committed to ensuring the integrity of its bills submitted to CLECs. SBC Midwest's wholesale bills are provided in BOS/BDT industry-standard format that follows the guidelines established by the Ordering and Billing Forum. SBC Midwest's wholesale bills contain sufficient information to enable CLECs to audit the accuracy of the charges. Under normal billing processes, unless CLECs have otherwise specified, they receive a detailed CABS customer service record (CSR) with each monthly bill. This CSR includes a detailed list of services billed at a circuit and USOC level. To further assist the CLECs in identifying charges billed, the CABS CSR includes an English-language Glossary Section that describes USOCs and field identifiers (FIDs) that appear on the bill. SBC Midwest Account Teams are also available to answer any specific billing questions related to rate elements appearing on a CLEC bill.

As an additional tool for CLECs to identify USOCs to corresponding ICA billing elements, SBC's Midwest region has agreed to provide CLECs an ICA specific USOC

listing for its contract in its Billing Auditability Plan, which was approved by the PSCW on July 3, 2003. It is the CLEC's responsibility to contact its Account Team representative to make this request. Once SBC receives such a request it will identify the related USOCs, if applicable, corresponding to each rate element identified in the CLEC's contract.

A. Analysis of Issue

1. Your belief as to the cause of the problem.
SBC does not view MCI Issue #1 as a "problem," per se, but as a business issue that should be addressed through the normal course of business.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? *No.*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
To the best of SBC's knowledge, MCI has not made a formal request that SBC provide it with USOC data for the elements identified in its contract.
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Elizabeth Simpson*

Telephone Number: *(214) 745-3873*

e-mail: *es2713@sbc.com*

Authorized Representative: *Glen Sirles*
Telephone Number: (214) 858-0700
e-mail: *gs1066@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
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II. Directions <ol style="list-style-type: none"> <i>1. Please complete a separate form for each issue.</i> <i>2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.</i> <i>3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.</i> <i>4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.</i>
III. Submitting Carrier(s) General Information <p>Submitted by: <i>MCI Entities</i></p> <p>Contact: Counsel for MCI: <i>Deborah Kuhn/Niles Berman</i> Telephone Number: <i>(312) 260-3326/(608) 441-3824</i> e-mail: <i>deborah.kuhn@mci.com/nberman@wheelerlaw.com</i></p> <p>Subject Matter Expert (SME): <i>Jeffrey Quinn/Sherry Lichtenberg</i> Telephone Number: <i>(312) 260-3445/(202) 736-6580</i> e-mail: <i>jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com</i></p> <p>Authorized Representative: <i>Contact Counsel</i> Telephone Number: e-mail:</p>
IV. Issue Identification <p>Name: IDENTIFICATION OF SUPPORT FOR BUSINESS RULES ASSOCIATED WITH USOCS/RATES Brief Description: <i>Require SBC to identify the cost studies, Commission orders, arbitration awards, etc. that support SBC's Business Rules</i></p>
V. Analysis of Issue <p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? <i>MCI began requesting that SBC provide this information approximately six months ago during Michigan 271 proceedings</i>

2. How many occurrences and approximately over how long a period of time? N/A
3. Is it a recurring problem? N/A
4. Your belief as to the cause of the problem. SBC has not yet developed or applied consistent rules for applying its business rules to wholesale bills
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High
7. Any other pertinent information? This will allow MCI (and other CLECs) to assess the underlying validity of SBC's business rules associated with each USOC. MCI is concerned that there are instances in which SBC is following its Business Rules, but they are unjustified.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? See #1 above
2. Was this issue escalated for dispute resolution? If so, when and in what forum? N/A
3. Last known position of the opposing carrier. SBC has not yet developed or applied consistent rules for applying its business rules to wholesale bills
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Require SBC to identify the cost studies, Commission orders, arbitration awards, etc. that support the Business Rules associated with each USOC and rate appearing on CLEC bills in Wisconsin

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

The relief MCI is seeking in the identification of cost studies, Commission orders, and arbitration awards, that support the Business Rules associated with USOCs and rates appearing on CLEC bills, is readily available to any CLEC, as this information is public.

SBC is committed to ensuring the integrity of its bills submitted to CLECs. SBC Midwest's wholesale bills are provided in BOS/BDT industry standard format that follows the guidelines established by the Ordering and Billing Forum. SBC Midwest's wholesale bills contain sufficient information to enable CLECs to audit the accuracy of the charges.

For example, in order for CLECs to identify USOCs that correlate to tariff billing

elements, SBC's Midwest region has provided element-specific USOCs, where applicable. These USOCs are available on CLEC Online in the Wisconsin Tariff USOC Guide.

Additionally, where applicable, SBC has provided on CLEC Online those USOCs associated with its Wisconsin generic interconnection agreement. Further, as addressed in SBC's response to MCI's Issue #1, CLECs can identify USOCs that correlate to ICA billing elements with the ICA-specific USOC listing for the CLECs' contracts that SBC's Midwest region has made available upon request.. CLECs bear the responsibility to request this listing.. Once SBC receives such a request, it will identify the USOCs, if applicable, corresponding to each rate element identified in the CLEC's contract.

The availability of SBC's Tariff USOC Guide and the generic interconnection agreement with USOCs was communicated to the CLEC community during CLEC Forums held on June 4, 2003 and April 2, 2003, respectively. Detailed instructions to access the USOC reference guide for the tariff and the generic ICA are on CLEC Online. All of the above information was included in SBC's Bill Auditability Plan filed with the PSCW on July 3, 2003.

A. Analysis of Issue

1. Your belief as to the cause of the problem.

MCI has not utilized the tools and resources made available to all CLECs for reviewing or auditing rates and USOCs. MCI representatives were present at the April 2, 2003 CUF when the Michigan generic UNE pricing schedule with USOCs was discussed. The Account Team has also informed MCI that this USOC information is available on CLEC Online.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *No.*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.

MCI provided a list of specific USOCs to Michigan regulatory and legal in February 2003, with which it questioned the application of those specific USOCs and rates. SBC provided the requested information to MCI in February 2003. Again, in June 2003, SBC discussed USOC identification with MCI, and also directed MCI to the tools available for identifying USOCs.

2. Were any bill adjustments made to resolve this issue? *No.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*

5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
SBC works with MCI business-to-business to address questions on MCI's bill regarding rates and USOCs.
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

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Subject Matter Expert (SME): *Marilynn Y. Williams*

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X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

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II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
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IV. Issue Identification
<p>Name: IDENTIFICATION OF USOCS APPLICABLE TO SBC'S TARIFFED RATES/ICA RATES</p> <p>Brief Description: Require SBC to include USOCs in its Wisconsin tariffs for every tariffed wholesale rate; standardize the descriptions of products and services found in SBC's tariffs and ICAs; provide USOC reference guides to ICAs</p>
V. Analysis of Issue
<p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? N/A

2. How many occurrences and approximately over how long a period of time? USOCs have never been included in SBC's tariffs, although SBC has recently published USOC Reference Guides for its Wisconsin tariffs at <https://clec.sbc.com/clec/shell.cfm?section=1503#WISCONSIN>
3. Is it a recurring problem? N/A
4. Your belief as to the cause of the problem. N/A
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High
7. Any other pertinent information? Assisting CLECs in connecting SBC's tariffed/ICA rates to the USOCs appearing on SBC's wholesale bills will allow MCI (and other CLECs) to audit those bills more usefully. Now that SBC has provided USOC Reference Guides to its Wisconsin wholesale tariffs, it is easier to match the USOCs that appear on CLEC bills with the rates in SBC's tariffs (and it would therefore appear possible for SBC to now include these USOCs in its filed tariffs). However, it is still difficult to match the descriptions of products and services in SBC's tariffs with those in MCI's interconnection agreement, and a similar USOC reference guide to ICA products and services would be extremely helpful.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Since MCI's entry into the local market in Michigan and Illinois in 2001. This was also raised in the 271 proceedings.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? N/A
3. Last known position of the opposing carrier. While SBC has not incorporated USOCs into its filed tariffs, it has now posted Wisconsin USOC Reference Guides on its CLEC On-Line website at <https://clec.sbc.com/clec/shell.cfm?section=1503#WISCONSIN>.
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? Yes – see Par. 3 above.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

- (1) Require SBC to update its Commission-filed tariffs to include USOCs (rather than simply providing informal USOC reference guides that may not be timely updated); (2) standardize the service and product descriptions in SBC's tariffs and interconnection agreements; (3) provide USOC reference guides to ICA products and services that do not match the service and product descriptions in SBC's tariffs.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with

statements made above, and by answering the following questions.)

In order for CLECs to identify USOCs that correlate to tariff billing elements, SBC's Midwest region has provided element-specific USOCs, where applicable. These USOCs are available on CLEC Online in the Wisconsin Tariff USOC Guide.

Additionally, where applicable, SBC has provided on CLEC Online those USOCs, associated with its Wisconsin generic interconnection agreement. Further, as addressed in SBC's response to MCI's Issue #1, CLECs can identify USOCs that correlate to ICA billing elements with the ICA-specific USOC listing for the CLEC's contracts that SBC's Midwest region has made available upon request. CLECs bear the responsibility to request this listing. Once SBC receives such a request, it will identify the USOCs, if applicable, corresponding to each rate element identified in the CLEC's contract.

The availability of SBC's Tariff USOC Guide and the generic interconnection agreement with USOCs was communicated to the CLEC community during CLEC Forums held on June 4, 2003 and April 2, 2003, respectively. At the April 2, 2003 CLEC Forum, SBC also offered to identify USOCs, where applicable, that are relevant to the CLEC's specific ICA. Based on the Forum attendee list, MCI was represented at both meetings. The individual CLEC-specific USOCs-to-ICA tool, generic interconnection agreements with USOCs, and the Tariff USOC Guides, were all included in SBC's Bill Auditability Plan that it filed with the PSCW on July 3, 2003.

Due to the unique nature of CLEC-specific contracts, SBC Midwest has established the specific USOC tools mentioned above to aid CLECs in identifying products and services found in contracts and tariffs. As previously discussed, upon CLEC request, SBC Midwest will add USOCs, where applicable, to CLEC-specific ICA pricing schedules. SBC Midwest has also made the Wisconsin Tariff USOC Guide, and the USOCs, where applicable, that apply to the generic interconnection agreement, available on CLEC Online. These three resources provide sufficient information for the CLECs to resolve any questions they may have with respect to product and service descriptions.

A. Analysis of Issue

1. Your belief as to the cause of the problem.
MCI's failure to avail itself of the tools available and its failure to timely renegotiate its Interconnection Agreement.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *N/A*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.

To the best of SBC's knowledge, it has not received a formal request from MCI to provide the related USOC data for the elements identified in its contract. However, according to the SBC CLEC Forum attendee list from the April 2, 2003 and June 4, 2003, MCI was represented at the meeting and should be aware of these USOC tools.

2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

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Contact: *Jim Jermain*

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<p>IV. Issue Identification</p> <p>Name: SBC BILLING ACCURACY PLAN Brief Description: <i>Require SBC to develop and implement a Billing Accuracy Plan that includes a component addressing the timely updating and accurate maintenance of its rate tables</i></p>
<p>V. Analysis of Issue</p> <p>Please answer the following questions:</p> <ol style="list-style-type: none"> <i>1. When this issue was first discovered? N/A</i> <i>2. How many occurrences and approximately over how long a period of time? N/A</i> <i>3. Is it a recurring problem? N/A</i> <i>4. Your belief as to the cause of the problem. SBC does not have an automated or documented method for updating its rate tables to include the most timely and accurate data. In addition, errors in other databases, such as ACIS, cause out-of-</i>

synch conditions that result in inaccurate CLEC billing.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: Medium
7. Any other pertinent information? This will reduce the number of errors in SBC's wholesale bills, thereby preserving MCI's (and other CLECs') auditing resources. As addressed in the 271 docket, many wholesale billing errors result from SBC's failure to maintain its rate tables adequately.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes, during the proceedings in PSCW Docket 6720-TI-170.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? No.
3. Last known position of the opposing carrier. SBC believes its Billing Auditability Plan is sufficient and has refused to implement and Billing Accuracy Plan, claiming that its bills are accurate.
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? No.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Require SBC to develop and implement a Billing Accuracy Plan that includes a component addressing the timely updating and accurate maintenance of its rate tables

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
SBC submits that MCI's proposal addresses a situation that no longer exists due to the steps that SBC has undertaken to verify that a timely and accurate updating of rate table occurs, as described in the Supplemental Affidavit of Justin W. Brown, Mark J. Cottrell and Michael E. Flynn that SBC submitted in support of its Michigan 271 application. The affidavit, which is attached below, further describes how the billing systems known as CABS are then updated with the rate table information. (The affidavit references Michigan; however the same process is utilized in Wisconsin.)



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In addition, SBC conducts Production Validation of rate tables by verifying that a CLEC's new price schedule matches the production tables used for CLEC billing.

These steps include:

- *verifying that the rate for USOCs and Class of Service match the new price schedule;*
- *verifying that the date for USOC/class of service match the effective date on the price schedule;*
- *notifying the applicable departments of any discrepancies in order to take corrective action; and*
- *repeating the validation process until the validation is correct.*

This process ensures that the rates used for billing of services purchased by CLECs match expectations.

SBC takes exception to MCI's suggestion that its Billing Auditability plan is deficient. The SBC Midwest Billing Auditability plan is a self-reporting plan which was developed at the direction of the Michigan Public Service Commission (MPSC), and for which CLECs had significant input via a collaborative process administered by the MPSC. The plan incorporates those items the MPSC felt were appropriate to be addressed. This plan has since been adopted by the remaining four SBC Midwest states and quarterly status reports are provided to all SBC Midwest State Commissions.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *No.*
3. What performance measures can be implemented to monitor the desired system operation? *In the current Billing PM Collaborative, SBC Wisconsin and CLECs have discussed proposed measures of billing rate table update accuracy and timeliness. Discussions on those proposals continue, and will likely continue into the six-month review collaborative schedule to commence September 15, 2003. SBC Wisconsin expects those discussions to result in appropriate measures being agreed upon by the industry and filed with the PSCW for approval. No independent action in this docket is necessary or advisable; the matter should be deferred.*
4. Any other pertinent information? *No.*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *Unknown*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *AT&T in this docket raised a similar issue (See AT&T-2).*
5. Did you identify any other problems arising from or related to this issue? *None at this time.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: (608) 252-2359

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Michael E. Flynn*

Telephone Number: (925) 823-7560

e-mail: *mf1354@sbc.com*

Authorized Representative: *John T. Anderson*

Telephone Number: (314) 235-5020

e-mail: *ja3478@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

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Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose
<i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i>
II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
III. Submitting Carrier(s) General Information
<p>Submitted by: <i>MCI Entities</i></p> <p>Contact: Counsel for MCI: <i>Deborah Kuhn/Niles Berman</i> Telephone Number: <i>(312) 260-3326/(608) 441-3824</i> e-mail: <i>deborah.kuhn@mci.com/nberman@wheelerlaw.com</i></p> <p>Subject Matter Expert (SME): <i>Jeffrey Quinn/Sherry Lichtenberg</i> Telephone Number: <i>(312) 260-3445/(202) 736-6580</i> e-mail: <i>jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com</i></p> <p>Authorized Representative: <i>Contact Counsel</i> Telephone Number: e-mail:</p>
IV. Issue Identification
<p>Name: CONFIRMATION OF SUMMARY FORMAT FOR SBC DISPUTE RESOLUTION</p> <p>Brief Description: Confirm that MCI can raise systemic billing disputes without submitting detailed lists of all affected TNs</p>
V. Analysis of Issue
<p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? <i>N/A</i>

2. How many occurrences and approximately over how long a period of time? N/A
3. Is it a recurring problem? N/A
4. Your belief as to the cause of the problem. N/A
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: Low
7. Any other pertinent information? SBC's current dispute resolution processes generally require MCI to submit a list of impacted TNs. When there are only a few TNs at issue, this is not a problem. When there is a global problem – for example, billing MCI for a USOC inapplicable to UNE-P service, thereby impacting thousands of TNs, this requirement is onerous and unnecessary. SBC used to reject any dispute submitted without a list of affected TNs, although it seems to have retreated from this position. MCI would like confirmation that SBC will continue to follow this revised approach.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? N/A
2. Was this issue escalated for dispute resolution? If so, when and in what forum? N/A
3. Last known position of the opposing carrier. N/A
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Confirm that MCI can raise systemic billing disputes without submitting detailed lists of all affected TNs without SBC rejecting the dispute.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
SBC does not believe that the issue raised by MCI is a problem per se. Rather, SBC believes that the issue is related more to the current business requirements of both MCI and SBC and should be addressed, therefore, on a business-to-business basis.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
The contracts of certain carriers, e.g. AT&T, require more detail than others when a party desires to raise a dispute. Consequently, in many cases, resolution

of this issue depends on the terms of individual agreements.

3. What performance measures can be implemented to monitor the desired system operation? *N/A*

4. Any other pertinent information?

To address this issue, SBC has begun a trial through a subcommittee of the CLEC User Forum (CUF) to attempt to work out a method by which the CLECs, for specific types of claims, can submit summarized dispute forms.

Should the trial be successful, this process would replace the process described by MCI for rate issues, one of the most common types of claims which has the potential to affect large quantities of TNs.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *AT&T Issue 3 raises a similar issue. SBC Wisconsin's response thereto is incorporated by reference.*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Fred Christensen*

Telephone Number: *(414) 319-5617*

e-mail: *fc1618@sbc.com*

Authorized Representative: *Carla Rowland*

Telephone Number: *(214) 464-7511*

e-mail: *cb8043@sbc.com*

X. Further Investigative Activities (for staff use only)

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

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II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
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<p>Submitted by: <i>MCI Entities</i></p> <p>Contact: Counsel for MCI: <i>Deborah Kuhn/Niles Berman</i> Telephone Number: <i>(312) 260-3326/(608) 441-3824</i> e-mail: <i>deborah.kuhn@mci.com/nberman@wheelerlaw.com</i></p> <p>Subject Matter Expert (SME): <i>Jeffrey Quinn/Sherry Lichtenberg</i> Telephone Number: <i>(312) 260-3445/(202) 736-6580</i> e-mail: <i>jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com</i></p> <p>Authorized Representative: <i>Contact Counsel</i> Telephone Number: e-mail:</p>
IV. Issue Identification
<p>Name: IMPROVE CONSISTENCY OF SBC'S BILLING DISPUTE RESOLUTION PROCESSES</p> <p>Brief Description: Requiring SBC to improve the consistency of its processes for handling and coding wholesale billing disputes and dispute resolution credits</p>
V. Analysis of Issue
<p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? <i>N/A</i> 2. How many occurrences and approximately over how long a period of time? <i>N/A</i>

3. Is it a recurring problem? N/A
4. Your belief as to the cause of the problem. N/A
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: Medium
7. Any other pertinent information? After submitting a billing dispute, MCI often receives multiple, conflicting responses from various individuals at SBC, both in their coding of the dispute and in their substantive response thereto. This complicates the dispute resolution process and results in inconsistent application of bill credits in resolving disputes.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? N/A
2. Was this issue escalated for dispute resolution? If so, when and in what forum? N/A
3. Last known position of the opposing carrier. N/A
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Require SBC to improve the consistency of its processes for handling and coding wholesale billing disputes and dispute resolution credits to reduce the incidence of CLECs receiving multiple conflicting responses from various representatives of SBC

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
SBC does not believe that its billing dispute resolution process is onerous. SBC believes that the nature of the process requires all parties to be as detailed and accurate as possible.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
SBC does not believe this issue to involve an interpretation or application of law.
3. What performance measures can be implemented to monitor the desired system operation?
During the next six-month review SBC is proposing the following PMs in order to measure its performance in regard to the billing dispute and resolution process.

PM CLEC BLG-2 - Measures the percent of time that SBC Midwest acknowledges CLEC billing claims/disputes within 5 business days of receipt by SBC Midwest.

PM CLEC BLG-3 - Measures the percent of time that SBC Midwest sends claims resolution notifications to the CLEC within 30 business days of receipt by SBC Midwest.

4. Any other pertinent information?

SBC is currently engaged in active discussions regarding the claims process with the CLECs in a Subcommittee of the CLEC User Forum. CLECs are encouraged to bring process issues to this forum. Progress has already been made, as evidenced by an email from a collaborative participant employed by TDS Metrocom, thanking SBC for making a recommended change to the claims process.

In the referenced email, Mr. Todd McNally of TDS Metrocom states, "TDS has done their fair share of raising concerns with SBC's billing operations, but I wanted to take the time to compliment SBC on their efforts relating to a specific enhancement that they have implemented regarding the Billing Dispute Claim Resolution form. I am starting to see that the forms are coming back with the BAN and Customer Claim # which is very useful. Please pass this note on to those who have helped implement this specific enhancement." While Mr. McNally is referring to a specific enhancement, his email is an example of SBC Midwest's willingness to work collaboratively with all CLECs, including MCI and TDS, in order to resolve issues.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *See above.*

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbccom*

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X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

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Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

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II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
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IV. Issue Identification
<p>Name: BILLING CLECS FOR LINES NOT THEIRS</p> <p>Brief Description: SBC has continued to bill CLECs for lines that do not belong to the CLECs being billed, or at least for which SBC has transmitted line loss notifications to CLECs</p>
V. Analysis of Issue
<p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? Shortly after MCI's launch of local service in Michigan and Illinois in 2001; problem has continued since Wisconsin launch

in March 2002

2. How many occurrences and approximately over how long a period of time? MCI audits SBC's lines-in-service report on a quarterly basis. This report purports to show the lines for which SBC is billing MCI. The lines are compiled from the ACIS database and appear to be based on provisioning records. Audits in March 2003 and July 2003 show that these records continue to be incorrect when compared to MCI's data. In addition, lines shown on the lines-in-service report do not match the lines for which MCI receives CABS bills.
3. Is it a recurring problem? Yes.
4. Your belief as to the cause of the problem. SBC failure to keep accurate records of lines owned by CLECs, coupled with SBC's transmission of erroneous line loss notifications. Manual handling in the SBC local service centers ("LSCs") and lack of review of the ACIS database appear to be additional contributors to this problem.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. No.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High
7. Any other pertinent information? MCI has raised this issue extensively in 271 proceedings throughout the region and was recognized by DOJ on July 16th as a continuing impediment to its support of SBC Michigan's pending 271 application.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes, in various performance measurement collaboratives, 271 filings, and business to business meetings. MCI believes that the majority of CLECs have raised this issue with SBC.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? MCI continues to discuss this issue on a business to business basis.
3. Last known position of the opposing carrier. SBC believes that this is a "normal" problem given the volume of customers to whom service is provisioned. SBC maintains that the problem is small and that there are no longer systemic problems with line loss notifications.
4. Were any bill adjustments made to resolve this issue? They will be, but the credit amounts are in question.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? SBC has been reluctant to admit the problem, much less fix it.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Require SBC to undertake a line reconciliation project for Wisconsin, at no cost to CLECs, to resolve the continuing inaccuracies in its records. Require SBC to improve its line loss notification processes and reduce the level of manual involvement in those

processes to reduce the incidence of the transmission of erroneous line loss notifications. Require SBC to meet with CLECs to describe the process used to update data in ACIS. Require SBC to make E&Y available for discussions regarding any work it has done to ensure that data in the ACIS database is correct and that data is correctly transmitted to the CABS database. Require SBC to issue CLECs their due and owing credits plus require interest for erroneous charges.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
SBC does not believe that its industry standard billing systems are systemically rendering inaccurate bills to CLECs.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
SBC does not believe this issue to involve an interpretation or application of law.
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information?
MCI's complaint that it is being billed inappropriately for some circuits amounts to nothing more than a rehash of LLN issues that are more than a year old, and that were dealt with and resolved in connection with the Michigan Public Service Commission ("MPSC") 271 proceeding. MCI's argument that the billing on these circuits somehow indicates a veritable ongoing problem with the accuracy of SBC Midwest's billing systems is, simply, unfounded. Specifically, in response to the MPSC's order dated December 20, 2001, SBC worked directly with the CLECs to resolve numerous LLN issues that (among other things) could potentially have resulted in the CLECs (1) continuing to bill after service had been migrated to a new provider (which could happen if an LLN for the line in question was not provided on a timely basis), or (2) failing to appropriately bill an end user (as could happen if an LLN was incorrectly provided on an account which the CLEC had not lost).

These efforts are detailed in the numerous and voluminous reports filed by SBC with the MPSC concerning its progress in addressing LLN issues. See, e.g., SBC Ameritech Michigan's Interim Report on the Line Loss Notification Issue, On the Commission's Own Motion, to Consider Ameritech Michigan's Compliance with the Competitive Checklist in Section 271 of the Federal Telecommunications Act of 1996, Case No. U-12320 (Jan. 9, 2002) (App. C, Tab 57); SBC Ameritech Michigan's Supplemental Report on the Line Loss Notification Issue, On the Commission's Own Motion, to Consider Ameritech Michigan's Compliance with the Competitive Checklist in Section 271 of the Federal Telecommunications Act of 1996, Case No. U-12320 (Jan. 29, 2002) (App. C, Tab 61); SBC Ameritech Michigan's Supplemental Report on the Line Loss Notification Issue, On the

Commission's Own Motion, to Consider Ameritech Michigan's Compliance with the Competitive Checklist in Sections 271 of the Federal Telecommunications Act of 1996, Case No. U-12320 (Feb. 28, 2002) (App. C, Tab 64); SBC Ameritech Michigan's Supplemental Report on the Line Loss Notification Issue, On the Commission's Own Motion, to Consider Ameritech Michigan's Compliance with the Competitive Checklist in Section 271 of the Federal Telecommunications Act of 1996, Case No. U-12320 (Apr. 1, 2002) (App. C, Tab 69); SBC Ameritech Michigan's Supplemental Report on the Line Loss Notification Issue, On the Commission's Own Motion, to Consider Ameritech Michigan's Compliance with the Competitive Checklist in Section 271 of the Federal Telecommunications Act of 1996, Case No. U-12320 (May 1, 2002) (App. C, Tab 76) ("May 1, 2002 Report"); SBC Ameritech Michigan's Supplemental Report on the Line Loss Notification Issue, On the Commission's Own Motion, to Consider Ameritech Michigan's Compliance with the Competitive Checklist in Section 271 of the Federal Telecommunications Act of 1996, Case No. U-12320 (June 3, 2002) (App. C, Tab 84); SBC Ameritech Michigan's Final Report on the Line Loss Notification Issue, On the Commission's Own Motion, to Consider Ameritech Michigan's Compliance with the Competitive Checklist in Section 271 of the Federal Telecommunications Act of 1996, Case No. U-12320 (July 2, 2002) ("Final Report") (App. C, Tab 87). Copies of these documents will be made available upon request.

SBC expended significant resources and effort throughout 2002 to address CLEC issues and concerns related to LLNs and to implement system fixes and enhancements to correct identified problems. Most importantly, in response to CLEC concerns regarding the accuracy of their databases as compared to SBC Midwest's databases following the various LLN fixes and enhancements, SBC developed a "Lines in Service" ("LIS") report that was made available to requesting CLECs pursuant to Accessible Letter CLECAM02-256 (June 17, 2002) (App. H, Tab 30). The LIS report provides a "snapshot" of a CLEC's active lines in the ACIS database as of a given date, including (among other things) a list of Working Telephone Numbers ("WTNs") attributed to the CLEC's codes as of that moment in time.

Using this report, CLECs may identify discrepancies between their records and SBC Midwest's records for reconciliation. SBC Midwest recommended the ACIS database as the best tool for conducting such reconciliation – a recommendation confirmed by the low rate of errors found in the above referenced database scans. MCI has received a copy of the LIS on a monthly basis since it was introduced. To date, the total discrepancies identified by MCI for investigation amounted to approximately 2% of its lines in service. Until the investigation is completed, no conclusion as to cause can be drawn.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*

2. Were any bill adjustments made to resolve this issue? *N/A*.
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).

CLECAM02-256



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4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *See above.*

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Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

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IV. Issue Identification
<p>Name: CABS RECONCILIATION</p> <p>Brief Description: Although SBC has conceded that it overbilled CLECs as a result of errors ostensibly caused by its migration to CABS billing in October 2002, the amount at issue still remains in dispute as to lines for which SBC used a proxy to determine the original installation date</p>
V. Analysis of Issue
<p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? <i>Late 2002</i>

2. How many occurrences and approximately over how long a period of time? N/A
3. Is it a recurring problem? The reconciliation itself is not, but the erroneous CABS bills are.
4. Your belief as to the cause of the problem. SBC failure to keep accurate records of lines owned by CLECs, coupled with SBC's transmission of erroneous line loss notifications; manual handling errors
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. No.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: Low
7. Any other pertinent information? This has been raised by MCI extensively in 271 proceedings throughout the region and was recognized by DOJ on July 16th as a continuing impediment to its support of SBC Michigan's pending 271 application.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes, in various 271 filings and business to business meetings.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Not yet.
3. Last known position of the opposing carrier. SBC believes this is a one-time problem that will be easily resolved.
4. Were any bill adjustments made to resolve this issue? The dispute involves credit amounts
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Require SBC to establish a team of knowledgeable personnel to work with affected CLECs to explain in detail its reconciliation process and provide satisfactory confirmation that all billing issues arising out of the CABS reconciliation have been resolved, including those as to lines for which SBC used a proxy to determine the original installation date. Require SBC to issue CLECs their due and owing credits plus required interest.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
The cause of this issue, which was thoroughly discussed in various ex-parte and other filings, in addition to direct meetings with MCI, was based on problems that resulted from the initial UNE-P conversion effort in 2001, not in October of

2002 as MCI suggests in Section IV, above. SBC has thoroughly discussed the resolution of the issue, which included system improvements and the reconciliation itself. MCI also confuses several issues in Section V, item 4, above, where it adds line loss notification, manual handling errors and into the discussion under the heading of "Reconciliation". The UNE-P reconciliation did not impact LLNs at all, nor did it change any UNE-P circuit information in ACIS.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
3. What performance measures can be implemented to monitor the desired system operation?

N/A (Reconciliation was a one-time event.)

4. Any other pertinent information?

E&Y thoroughly audited the reconciliation credits and debits, in addition to sampling SBC's current level of synchronization between the provisioning (ACIS) and billing (CABS) databases. E&Y reported that the mechanical program that calculated the debits and credits executed the debits and credits accurately according to the design. MCI has not supplied any UNE-P circuits for which they were either under-credited or over-billed. Mechanical reconciliation OC&Cs are readily available to MCI on its February CABS bill complete with dates and UNE-P circuit numbers. SBC stands ready to investigate any reconciliation generated OC&C that MCI feels has been inappropriately billed.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.

As set forth in the Brown-Cottrell-Flynn MI 2 Supp Billing Reply Aff, (In the Matter of Application by SBC Communications, Inc., Michigan Bell Telephone company, and Southwestern Bell Communication Services, Inc. for the Provision of In-region, InterLATA Services in Michigan, WC – Docket No. 03-138) MCI questioned the debits and credits in association with the CABS reconciliation. The account team facilitated a meeting between MCI and SBC subject matter experts on the entire reconciliation process. A presentation and full explanation was given to MCI about the debits and credits. This meeting was held on June 24, 2003. After thoroughly reviewing the reconciliation process and how it was handled, MCI has not presented any additional questions to SBC. In reference to MCI's general comments related to SBC's "failure to keep accurate records", MCI submitted a list of numbers that it thought were inaccurate based on a review of its July 2002 Lines in Service report provided by SBC. A preponderance of the "errors" submitted by MCI were actually MCI record-keeping errors. MCI recently submitted a list of new alleged SBC errors, and initial findings are that the "errors" are, once again, mostly with MCI's own record-keeping.

2. Were any bill adjustments made to resolve this issue?

Not to MCI. E&Y's audit did uncover issues with other CLEC contracts related to the application of back-billing and crediting limitation dates, which has since

- been corrected and such corrections have been validated by E&Y.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
 4. Identify any other carrier(s) known to have experienced similar problems. *AT&T has also brought forward a concern in this area. However, no specific claim or example has been brought forward that has demonstrated that the reconciliation produced over-debiting or under-crediting.*
 5. Did you identify any other problems arising from or related to this issue? *As described above, E&Y identified circumstances where some credit and debit effective dates from the prevailing ICA or tariff were not interpreted correctly. All anomalies identified have been credited or debited appropriately and all such adjustments have been thoroughly validated by E&Y.*
 6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *See E&Y's report submitted in Docket 6720-TI-170. SBC directed E&Y to thoroughly audit the reconciliation process; all anomalies that were detected were corrected, and such corrections were validated by E&Y.*
 7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A (Reconciliation was a one-time event.)*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

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Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Phil Dumm*

Telephone Number: *(317) 265-4009*

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Authorized Representative: *John T. Anderson*

Telephone Number: *(314) 235-5020*

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X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose
<i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i>
II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
III. Submitting Carrier(s) General Information
<p>Submitted by: <i>MCI Entities</i></p> <p>Contact: Counsel for MCI: <i>Deborah Kuhn/Niles Berman</i> Telephone Number: <i>(312) 260-3326/(608) 441-3824</i> e-mail: <i>deborah.kuhn@mci.com/nberman@wheelerlaw.com</i></p> <p>Subject Matter Expert (SME): <i>Jeffrey Quinn/Sherry Lichtenberg</i> Telephone Number: <i>(312) 260-3445/(202) 736-6580</i> e-mail: <i>jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com</i></p> <p>Authorized Representative: <i>Contact Counsel</i> Telephone Number: e-mail:</p>
IV. Issue Identification
<p>Name: ERRONEOUS NRCs</p> <p>Brief Description: SBC has not responded adequately to CLECs' questions regarding non-recurring charges ("NRCs") and usage charges appearing erroneously on CLECs' UNE-P bills</p>
V. Analysis of Issue
<p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? It is an ongoing problem, but was highlighted in 271 proceedings throughout the region

2. How many occurrences and approximately over how long a period of time? It has been a consistent problem with MCI's UNE-P bills since it entered the local market in March 2002.
3. Is it a recurring problem? Yes.
4. Your belief as to the cause of the problem. SBC's failure to maintain accurate rate tables and the extensive use of manual intervention in the ordering process.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. No.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High
7. Any other pertinent information? SBC has been charging USOCs SEPUP and SEPUC on residential UNE-P migration orders, even though these USOCs are inapplicable to migration orders (and SEPUP is applicable only to business lines). SBC has estimated that 95% of its SEPUP charges to CLECs are incorrect, and 80% of its SEPUC charges to CLECs are incorrect. SBC has also been charging CLECs for truck rolls (USOC V1N) on UNE-P orders even though truck roll charges do not apply to UNE-P. SBC also cannot explain why we are billed for different numbers of loop, cross connect, and switch ports each month.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes, in various 271 filings and business to business meetings, as well as billing disputes.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Not yet.
3. Last known position of the opposing carrier. SBC seems to concede that the vast majority of these charges are inaccurate.
4. Were any bill adjustments made to resolve this issue? Not yet.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? No.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Require SBC to undertake an audit and revision of its rate tables to ensure that USOCs inapplicable to residential UNE-P service do not continue to appear on wholesale bills. Require SBC to issue CLECs their due and owing credits plus required interest. See also relief sought in MCI templates regarding USOCs and business rules.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
This issue was set forth in great detail in paragraphs 20 – 26 of the reply affidavit

of Justin W. Brown filed in Docket 6720-TI-170 on April 28, 2003. Copies of this affidavit are available upon request.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

SBC does not believe this issue to involve an interpretation or application of law.

3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information?

The current SBC Wisconsin tariff calls for SBC Wisconsin to charge for three USOCs on POTS to UNE-P migration orders. The SEPUP USOC (Loop service order charge), the NR9UU USOC (Initial Port service order charge) and in the case of residence service, the UJR USOC (Residence POTS ports charge). Each of these charges, SEPUP, NR9UU and UJR, are legitimate and the CLECs will continue to see these charges on their migration orders. SBC Wisconsin acknowledges that there have been some manual errors made in regard to another USOC, that of SEPUC (Loop connection charge).

The SEPUC USOC is normally used when a CLEC is establishing an entirely new account. A new account is established by issuing a new ("N") type service order. As noted above, migration orders from SBC Wisconsin POTS or Resale service can be completed via a single change ("C") service order. However, if a CLEC is migrating an end user from another UNE-P provider to its UNE-P service, then it is necessary for the LSC to issue two orders. One service order to disconnect ("D") the UNE-P line from the old CLEC's account and one new ("N") service order to establish the UNE-P line on new CLEC's account.

Some LSC Service Representatives initially misunderstood the migration process and mistakenly believed that all N orders required the SEPUC USOC, not realizing that, in the migration situation described above, the winning CLEC was not establishing a new service, but was migrating an existing end user from another CLEC. To the extent that errors occur, the LSC's claims process is in place to resolve these errors. MCI should be encouraged to work collaboratively with the LSC Billing team to resolve any outstanding issues regarding the SEPUC USOC. SBC Wisconsin fully intends to work through any billing related issues with any and all CLECs in a normal business-to-business manner to resolve such issues.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems.
MCI acknowledges, above, that this is another version of issues raised already in this docket. (See section VII.)

5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *See above.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Fred Christensen*

Telephone Number: *(414) 319-5617*

e-mail: *fc1618@sbc.com*

Authorized Representative: *Carla Rowland*

Telephone Number: *(214) 464-7511*

e-mail: *cb8043@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose
<i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i>
II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
III. Submitting Carrier(s) General Information
<p>Submitted by: <i>MCI Entities</i></p> <p>Contact: Counsel for MCI: <i>Deborah Kuhn/Niles Berman</i> Telephone Number: (312) 260-3326/(608) 441-3824 e-mail: deborah.kuhn@mci.com/nberman@wheelerlaw.com</p> <p>Subject Matter Expert (SME): <i>Jeffrey Quinn/Sherry Lichtenberg</i> Telephone Number: (312) 260-3445/(202) 736-6580 e-mail: jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com</p> <p>Authorized Representative: <i>Contact Counsel</i> Telephone Number: e-mail:</p>
IV. Issue Identification
<p>Name: MANUAL ERROR</p> <p>Brief Description: SBC should present a proposal to rectify the billing problems that it has repeatedly blamed on manual error</p>
V. Analysis of Issue
<p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? When MCI entered the local market in Michigan and Illinois in 2001; problem has continued since Wisconsin entry in March 2002

2. How many occurrences and approximately over how long a period of time?
Repeated issue since SBC began issuing MCI wholesale bills
3. Is it a recurring problem? Yes
4. Your belief as to the cause of the problem. N/A
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: Medium
7. Any other pertinent information? No matter how much work SBC does on its OSS, the continued inclusion of manual processes in the wholesale billing process guarantees the continued incidence of manual error.

VI. Prior Attempts to Resolve the Issue (*Please do not re-argue your case here or submit supporting documents.*)

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? PM Collaboratives, 271 filings and business-to-business meetings.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? N/A
3. Last known position of the opposing carrier. SBC downplays the importance of manual error in its billing systems.
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

VII. Relief Sought

(*Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).*)

Require SBC to develop a plan to rectify the billing concerns it attributes to manual error, and reduce the use of manual handling.

VIII. Opposing Carrier's Response (*to be completed after July 30, 2003, prehearing*)

(*Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.*)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
Manual Service Representative error.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
SBC does not believe this issue to involve an interpretation or application of law.
3. What performance measures can be implemented to monitor the desired system operation? N/A
4. Any other pertinent information?
Contrary to MCI's implied assertion, SBC does embrace process improvement efforts that result in the reduction and elimination of human error in its processes. However, because humans make mistakes, mistakes will always happen. They

are, simply, an unavoidable fact of life. It is unreasonable to expect SBC Wisconsin to remove every possible human intervention in every one of its processes. MCI's panacean assertion is not only unattainable, it is unrealistic.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Fred Christensen*

Telephone Number: *(414) 319-5617*

e-mail: *fc1618@sbc.com*

Authorized Representative: *Carla Rowland*

Telephone Number: *(214) 464-7511*

e-mail: *cb8043@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: *MCI Entities*

Contact: Counsel for MCI: *Deborah Kuhn/Niles Berman*
Telephone Number: (312) 260-3326/(608) 441-3824
e-mail: deborah.kuhn@mci.com/nberman@wheelerlaw.com

Subject Matter Expert (SME): *Jeffrey Quinn/Sherry Lichtenberg*
Telephone Number: (312) 260-3445/(202) 736-6580
e-mail: jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com

Authorized Representative: *Contact Counsel*
Telephone Number:
e-mail:

IV. Issue Identification

Name: **6720-TI-161 TRUE-UP**

Brief Description: The Commission should not close the issues list for this proceeding until the true-up process for Docket No. 6720-TI-161 is substantially underway, since it is likely to raise presently unknown billing problems.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? N/A
2. How many occurrences and approximately over how long a period of time? N/A

3. Is it a recurring problem? N/A
4. Your belief as to the cause of the problem. N/A
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High
7. Any other pertinent information?

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? N/A
2. Was this issue escalated for dispute resolution? If so, when and in what forum? N/A
3. Last known position of the opposing carrier. N/A
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Decline to close the issues list for this proceeding until the true-up process for Docket No. 6720-TI-161 is substantially underway, since it is likely to raise presently unknown billing problems.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
In no respect does MCI Issue #11 constitute a billing issue. SBC believes the implementation of the UNE Compliance Order is best dealt with in the 6720-TI-161 UNE Cost Docket.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
3. What performance measures can be implemented to monitor the desired system operation? N/A
4. Any other pertinent information? N/A

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. N/A
2. Were any bill adjustments made to resolve this issue? N/A
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). N/A

4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

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e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Jim Jermain*

Telephone Number: *(608) 252-2359*

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Authorized Representative: *Scott VanderSanden*

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X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

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4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: *MCI Entities*

Contact: Counsel for MCI: *Deborah Kuhn/Niles Berman*
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e-mail: deborah.kuhn@mci.com/nberman@wheelerlaw.com

Subject Matter Expert (SME): *Jeffrey Quinn/Sherry Lichtenberg*
Telephone Number: (312) 260-3445/(202) 736-6580
e-mail: jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com

Authorized Representative: *Contact Counsel*
Telephone Number:
e-mail:

IV. Issue Identification

Name: **6720-TI-161 TRUE-UP**

Brief Description: The Commission should not close the issues list for this proceeding until the true-up process for Docket No. 6720-TI-161 is substantially underway, since it is likely to raise presently unknown billing problems.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? N/A
2. How many occurrences and approximately over how long a period of time? N/A

3. Is it a recurring problem? N/A
4. Your belief as to the cause of the problem. N/A
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High
7. Any other pertinent information?

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? N/A
2. Was this issue escalated for dispute resolution? If so, when and in what forum? N/A
3. Last known position of the opposing carrier. N/A
4. Were any bill adjustments made to resolve this issue? N/A
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Decline to close the issues list for this proceeding until the true-up process for Docket No. 6720-TI-161 is substantially underway, since it is likely to raise presently unknown billing problems.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
In no respect does MCI Issue #11 constitute a billing issue. SBC believes the implementation of the UNE Compliance Order is best dealt with in the 6720-TI-161 UNE Cost Docket.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. N/A
3. What performance measures can be implemented to monitor the desired system operation? N/A
4. Any other pertinent information? N/A

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. N/A
2. Were any bill adjustments made to resolve this issue? N/A
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). N/A

4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Authorized Representative: *Scott VanderSanden*

Telephone Number: *(414) 270-5920*

e-mail: *sv3456@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

- 1. Please complete a separate form for each issue.*
- 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
- 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
- 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

III. Submitting Carrier(s) General Information

Submitted by: *MCI Entities*

Contact: Counsel for MCI: *Deborah Kuhn/Niles Berman*
Telephone Number: *(312) 260-3326/(608) 441-3824*
e-mail: *deborah.kuhn@mci.com/nberman@wheelerlaw.com*

Subject Matter Expert (SME): *Jeffrey Quinn/Sherry Lichtenberg*
Telephone Number: *(312) 260-3445/(202) 736-6580*
e-mail: *jeffrey.quinn@mci.com/sherry.lichtenberg@mci.com*

Authorized Representative: *Contact Counsel*
Telephone Number:
e-mail:

IV. Issue Identification

Name: **SBC FAILURE TO IMPLEMENT 6720-TI-161 TRUE-UP**
Brief Description: Seven weeks after the Commission issued its July 9, 2003 UNE Compliance Order in PSCW Docket 6720-TI-161, SBC has failed to issue an accessible letter or take other action to implement the true-up requirements of that order and the PSCW's earlier March 22, 2002 Final Decision in that docket.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? N/A
2. How many occurrences and approximately over how long a period of time? N/A
3. Is it a recurring problem? N/A
4. Your belief as to the cause of the problem. N/A
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. The true-up obligation arises under Commission order, but SBC has not, to date, raised a legal objection to the true-up obligation.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High
7. Any other pertinent information? MCI raised this issue with SBC in a series of e-mail inquiries from July 11th to August 25th. SBC advised that the true-up process would be addressed by a forthcoming accessible letter and would likely be implemented via account management. SBC did issue Accessible Letter CLECAM03-259 (dated July 31, 2003), which set forth a process for requesting an interconnection agreement amendment to implement the new rates approved in the UNE Compliance Order, but that letter did not address the true-up requirements of the order. Subsequent inquiries from MCI did not result in the issuance of a second accessible letter addressing the true-up requirements of the UNE Compliance Order, or in any contact from SBC account management.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes. See #7 above.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? As a result of the above-referenced e-mail inquiries, MCI contacted its SBC account manager on August 26th requesting that SBC address its true-up obligations. MCI has received no response.
3. Last known position of the opposing carrier. MCI does not know whether SBC intends to challenge the true-up obligation, or is simply failing to implement the true-up on a timely basis.
4. Were any bill adjustments made to resolve this issue? No
5. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Direct SBC to implement the true-up process for Docket No. 6720-TI-161 immediately.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

SBC has complied with the July 9, 2003, Compliance Order in PSCW Docket 6720-TI-

161, Investigation into SBC Wisconsin's Unbundled Network Elements. SBC filed the UNE tariffs as required on July 11, 2003. Also, as noted in MCI's comments, SBC issued accessible letter CLECAM03-259 on July 31, 2003, to inform CLECs that the tariff had been filed, and that CLECs with an effective ICA are required to amend their ICA to incorporate the PSCW ruling. An amendment request form was included with the accessible letter. MCI has not, as of this date, returned that necessary form.

Upon receiving an amendment request, SBC will prepare and send to MCI an amendment with an individual customized pricing sheet incorporating the PSCW ruling.

SBC is proceeding with the true-up process and will implement the true-up as quickly as possible. However, as noted in the aforementioned accessible letter, due to necessary programming and methods changes, there will be some delay before all requirements can be implemented. SBC will work on a business-to-business basis with each applicable CLEC to apply the true-up in accordance to the terms and conditions of each individual ICA.

A. Analysis of Issue

1. Your belief as to the cause of the problem.

MCI has not allowed SBC sufficient time to work through the process and implement this large true-up that impacts several CLECs.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

The PSCW "Final Decision" in Docket 6720-TI-161, Investigation into SBC Wisconsin's Unbundled Network Elements, requires CLECs with an effective ICA to amend their ICA to include the mandated rates, terms and conditions from the order. SBC is complying with the order and working to provide true-ups to CLECs where applicable.

3. What performance measures can be implemented to monitor the desired system operation?

N/A

4. Any other pertinent information?

SBC works with MCI on a business-to-business basis to resolve any contract or billing issue. MCI did not contact the Account Team regarding this issue until August 26, 2003, at which time the Account Team agreed to look into the matter and to let MCI know its findings.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.

See above.

2. Were any bill adjustments made to resolve this issue?

Not at this time.

3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).

CLECAM03-259



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4. Identify any other carrier(s) known to have experienced similar problems.
All applicable CLECs in Wisconsin.
5. Did you identify any other problems arising from or related to this issue?
N/A
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
N/A
7. Were any policies or procedures changed to address this issue? If so, what changes were made?
N/A

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact *James Jermain*

Telephone Number: *(608)-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Marilynn Williams*

Telephone Number: *(214)-464-1750*

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Authorized Representative: *Glenn Sirles*

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e-mail: *gs1066@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

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